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April 28, 2021

VIA ECF AND EMAIL
Hon. Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
Brooklyn, NY 10007

Re: U.S. v. Sal Tagliaferro

19 Cr. 472 (PAC)

Dear Judge Crotty:

I write to respectfully request that your Honor approve, *nunc pro tunc*, Defendant's request to reimburse the court reporters for the excellent and expedited trial transcripts that have been provided to counsel since the commencement of the trial.

I apologize for not having made this request earlier; however, I was apparently under the mistaken impression that the defense counsel was entitled to the same transcript arrangements as government counsel – as long as there was an agreement to split the cost – which there was.

The court reporters in this case have provided extraordinarily accurate transcripts, on an expedited basis, which made it possible for counsel to be well prepared for the examination of all witnesses. Additionally, their excellent work made it possible to move the case forward without unnecessary delay.

Accordingly, counsel respectfully requests that your Honor authorize the payment for the expedited transcripts that we received.

Respectfully submitted,

Susan G. Kellman Susan G. Kellman

cc: All Counsel

Southern District Court Reporters